

June 23, 2021

**VIA ECF**

The Honorable Analisa Torres, U.S.D.J.  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**RE: Shaw v. ProCore, LLC**  
**Civil Action No.: 1:21-cv-03883 (AT)**

Dear Judge Torres:

Our firm represents Defendant ProCORE, LLC (improperly pleaded as ProCore, LLC) (“Defendant”) in the above-referenced matter. We write to seek clarification on Defendant’s deadline to respond to the Complaint, and request an extension of time to move, respond or otherwise answer the Complaint accordingly.

Pursuant to the Court’s Order dated May 28, 2021, this case was referred to mediation under Local Civil Rule 83.9 and as part of a pilot program for cases involving claims under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.* As such, the parties have conferred and agreed to participate in mediation on **July 14, 2021**.

The current deadline for Defendant to move, respond or otherwise answer the Complaint is June 25, 2021. Defendant respectfully seeks clarification regarding its obligation to move, respond or otherwise answer the Complaint prior to the conclusion of mediation. To the extent that Defendant does have an obligation to move, respond or otherwise answer the Complaint, Defendant respectfully requests an extension of time until **July 30, 2021** so that the parties can allocate their time and resources towards the upcoming mediation. **Plaintiff has consented to this request.** Defendant does not believe this extension will impact deadlines in this case given this early juncture.

Respectfully submitted,

NUKK-FREEMAN & CERRA, P.C.

/s/ Brian L. Tremmer  
Brian L. Tremmer, Esq.